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United States of America

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	1:02-cr-5438-OWW
	)	
Plaintiff,	)	STIPULATION AND <b>ORDER</b> re:
	)	AGREEMENT TO MOVE JURY TRIAL
v.	)	DATE
	)	
AKOP KRBOYAN,	)	DATE: September 7, 2011
	)	TIME: 9:00 a.m.
Defendant.	)	Honorable Oliver W. Wanger
_____	)	

The United States of America, by and through Assistant United States Attorneys Mark E. Cullers and Jeremy R. Jehangiri, and Defendant Akop Krboyan, by and through his counsel Anthony P. Capozzi, submit this stipulation for the Court's consideration.

IT IS STIPULATED AND AGREED:

1. The parties request that the jury trial date in this case be continued from August 17, 2011, to September 7, 2011, at 9:00 a.m.

2. The parties stipulate that the time between August 17, 2011, and, through and excluding, September 7, 2011, should be excluded from the calculation of time under the Speedy Trial Act.

3. Due to an unforeseen medical emergency involving counsel, the

1 parties stipulate and agree to this continuance. The parties stipulate  
2 that the ends of justice are served by the Court excluding such time,  
3 so that counsel for the defendant may have reasonable time necessary for  
4 effective preparation, taking into account the exercise of due  
5 diligence. 18 U.S.C. § 3161(h)(8)(B)(iv).

6 4. The parties stipulate and agree that the interests of justice  
7 served by granting this continuance outweigh the best interests of the  
8 public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

9 SO STIPULATED AND AGREED.

10 Dated: August 9, 2011

/s/ Mark E. Cullers

Mark E. Cullers  
Assistant United States Attorney

/s/ Jeremy Jehangiri

Jeremy R. Jehangiri  
Assistant United States Attorney

15 Dated: August 9, 2011

/s/ Anthony P. Capozzi (as authorized)

Anthony P. Capozzi  
Attorney for Defendant, Akop Krboyan

19 **ORDER**

20 IT IS SO ORDERED.

21 IT IS SO ORDERED.

22 **Dated: August 9, 2011**

**/s/ Oliver W. Wanger**  
**UNITED STATES DISTRICT JUDGE**